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**BY CM/ECF**

The Hon. Richard M. Berman  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
Courtroom 17B  
New York, NY 10007

Re: *Thuc Pham v. China Finance Online Co. Ltd.*, et al., 1:15-CV-7894-RMB

Dear Judge Berman:

We represent court-appointed Lead Plaintiffs Jihong Wang, Qi Li, and Les Akio Omori (“Plaintiffs”), in the above-referenced securities class action and write to request an eight day extension of our time to file our Amended Complaint. The current deadline, set by Judge Anderson, is October 19. With the extension, the deadline would become October 27.

This action was recently transferred to this Court from the Honorable Percy Anderson, United States District Judge, Central District of California, pursuant to a stipulation (the “Stipulation”) between Lead Plaintiffs and Defendant China Finance Online Co. Ltd., entered into to preserve the parties and the Court from the expense of China Finance’s motion to transfer venue to this Court. No parties have been served, but China Finance has now agreed to waive service.

In light of the transfer, China Finance’s request to waive service, and Plaintiffs’ investigation made through China-based private investigators, Plaintiffs request a brief extension of their time to file an Amended Complaint. **Defendant China Finance consents to the extension.** The other Defendants, who are both China Finance officers, have not appeared or contacted Plaintiffs.

This is the first request for an extension that is made to this Court. Plaintiffs have previously requested an extension of their time to file their amended complaint because Golden Week, a Chinese national holiday lasting between October 1 and October 7, made Plaintiffs’ investigation impossible during that time. Judge Anderson granted this request. In the Stipulation, the Parties requested an extension of Plaintiffs’ time to file an amended complaint, which Judge Anderson denied.

Respectfully submitted,  
/s/ Jonathan Horne

cc: All counsel of record (by CM/ECF)